

**REMARKS/ARGUMENT****Regarding the Objections to the Specification:**

An amended Abstract is submitted herewith which addresses the objection stated in Section 1 of the outstanding Office Action.

The objections raised in Section 2 of the Office Action have been addressed in the amendments to the specification. The amendments introduce no new matter

**Regarding the Claims in General:**

Claims 1-11 and 13-18 remain pending. Claim 12 has been canceled without prejudice, and claims 1-8, 10-11, and 13-17 have been amended to better highlight the distinguishing features of the invention, to better reflect customary idiomatic English, and U.S. claim practice, and to replace means plus function recitations with structural recitations.

**Regarding The Allowable Subject Matter**

Applicants note with appreciation the indication that claims 5-7 and 14-16 would be allowed if rewritten in independent form incorporating the limitations of their respective parent claims. Because these claims are all directly or indirectly dependent on claim 1 or 10, which are believed to be allowable as amended, claims 5-7 14-16 have been retained in dependent form pending the Examiner's further consideration.

**Regarding the Prior Art Rejections:**

In the outstanding Office Action, claims 1, 2, 4, 9, 10, 11, 13, and 18 were rejected as anticipated by Van Den Herik U.S. Patent 6,253,032 (Van Den Herik), and claims 1-4, 8, 10-13, 17 were rejected as unpatentable over Rhodes et al. U.S. Patent 5,745,166 (Rhodes) in view of Guichard et al. U.S. Patent 5,357,870 (Guichard) and Tomitaka U.S. Patent 5,430,809 (Tomitaka). Applicants respectfully submit that these rejections are not valid as to the claims as now written, and reconsideration and withdrawal of these rejections are accordingly requested.

Further, for security applications, the Examiner can surely take Official Notice of the fact that multiple monitors are required and that these are typically arranged in an array that extends both horizontally and vertically. Since the monitors are fixed in place, if someone needs to scan all or a subset of the monitors, it is a simple matter to look directly at the monitors of interest, or to approach them physically, if necessary. Even if there are so many monitors that some would be too far away to view conveniently from a fixed position if the screens all face forward, the simple solution would be to angle the monitors toward an intended viewing position, rather than adopt some complex scheme for moving the monitors. In any event, there would be no purpose in following the viewer's face, even if there are benefits to moving the monitors. In short, one skilled in the art would have no motivation to combine the teachings of Rhodes and Guichard. Only a patent examiner would have a reason to think up something like that to meet the requirements of U.S. patent examination practice, but even then, it could only be inspired by applicants' own teachings, and not by legitimate motivation in the prior art itself.

Tomitaka is directed to a system which allows a video camera to track an object being photographed, e.g., to keep a person in the field of view of the camera. While that might be adaptable to and useful in the context of Guichard, and perhaps in controlling movement of Rhodes' cameras if it is necessary to keep someone in view, it certainly has no application to controlling Rhodes' monitors. As explained above, making Rhodes' monitors able to track movement of a viewer would serve no useful purpose, and would not be obvious. Thus, what Tomitaka teaches is simply irrelevant.

Even if the teachings of the three references are combined, there is no reasonable combination suggested by the prior art which meets the terms of the claims as amended. Claim 1, for example, is directed to a control unit for a television camera viewfinder. Specifically the claim calls for:

an image pickup device for picking up a face of a television camera operator; and

a control device for training said viewfinder on the face of the television camera operator in response to an image output from said image pickup device.

Claim 10 is more detailed, but also recites a similar structural arrangement. None of the references, whether considered alone or together, suggest a television camera with a movable view finder. Even in Guichard, the only reference which suggests a movable viewing device of any kind, the image on the monitor is not produced by a television camera operated by the person viewing the monitor, but rather an image of someone in front of a remotely located camera totally beyond the control of the person viewing the monitor.

Independent claims 1 and 10 are therefore allowable for this additional reason.

2-4 and 8 are dependent on claim 1, and claims 11, 13, and 17 are dependent on claim 10. These claims are allowable for the reasons stated above, and also because they recite features which considered in combination with those of their parent claims, are not taught or suggested in the references, either alone, or in combination.

Also, since claims 9 and 18 have been rejected only on the basis of Van Den Herik, they are allowable along with claims 1-8, 10, and 11-17.

In view of the foregoing, favorable reconsideration and allowance of this application are respectfully solicited.

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April 27, 2004

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